

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

Scott Hutchison Enterprises, Inc., et al.,	:	Civil Action No. C-1-01-776
	:	
Plaintiffs	:	Judge Weber
	:	
v.	:	AFFIDAVIT OF THOMAS R. SCHUCK
	:	IN SUPPORT OF DEFENDANT
Rhodes, Inc., et al.,	:	BOGGS' MOTION FOR SUMMARY
	:	JUDGMENT AGAINST DEFENDANTS
Defendants	:	RHODES, ZIMMER, AND GEISLER

Defendant H.T. Boggs hereby submits the attached affidavit of Thomas R. Schuck in support of his motion for summary judgment against Defendants Rhodes, Zimmer, and Geisler (doc. no. 151).

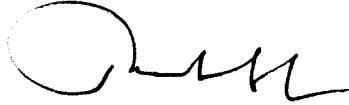
Respectfully submitted,



Thomas R. Schuck (0005336)
Trial Attorney for Defendant H.T. Boggs
425 Walnut Street, Suite 1800
Cincinnati, Ohio 45202-3957
(513) 381-2838

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he served a copy of the foregoing Affidavit of Thomas R. Schuck in Support of Defendant Boggs' Motion for Summary Judgment Against Rhodes, Zimmer, and Geisler upon the following counsel of record and unrepresented parties electronically or by regular United States mail, postage prepaid this 10th day of February, 2006.



Thomas R. Schuck

William P. Schroeder, Esq.
11935 Mason Road, Suite 100
Cincinnati, Ohio 45249
Attorney for Plaintiffs

E. David Marshall, Esq.
271 West Short Street, Suite 111
Lexington, Kentucky 40507

James M. Zimmer, *pro se*
3164 Roxbury Drive
Lexington, Kentucky 40503

H. Jack Geisler, *pro se*
33868 Moundview Court
Lexington, Kentucky 40502

AFFIDAVIT OF THOMAS R. SCHUCK

COUNTY OF HAMILTON)
) ss:
STATE OF OHIO)

Thomas R. Schuck, having first been duly cautioned and sworn, states as follows:

1. I am an attorney admitted to practice law in the State of Ohio and a partner in the law firm of Taft, Stettinius & Hollister LLP, and serve as trial attorney for H.T. Boggs, a defendant in Civil Action No. C-1-01-776, pending in the United States District Court for the Southern District of Ohio, in which capacity I have personal knowledge and am competent to testify with respect to the matters set forth herein.

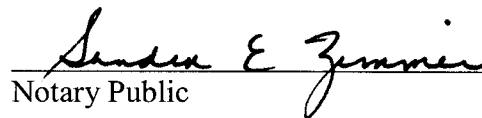
2. Attached hereto are copies of the statements of attorney's fees and expenses which my law firm rendered to Mr. Boggs through August 31, 2005 in connection with our representation of him in this action. These fees and expenses were actually and necessarily incurred on his behalf, and he has paid them.

Further affiant sayeth naught.



Thomas R. Schuck

Sworn to and subscribed before me this 16th day of December, 2005


Notary Public

SANDRA E. ZIMMER
Notary Public, State of Ohio
My Commission Expires April 21, 2007